

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**SAFYA ROE YASSIN,**

**Defendant.**

**No. 16-MJ-2009 DPR**

**MOTION FOR DETENTION**

The United States of America, by and through its undersigned counsel, moves this Court to order the pretrial detention of defendant Safya Roe Yassin and states the following in support of the motion:

1. This motion was orally made at the time of the defendant's first appearance before a judicial officer. A criminal complaint has been filed charging the defendant with transmitting in interstate commerce a threat to injure the person of another, in violation of 18 U.S.C. § 875(c).

2. The charge in the complaint involves a crime of violence. *See* 18 U.S.C. §§ 3142(f)(1)(A) and 3156(a)(4).

3. The United States submits that there is clear and convincing evidence that there are no conditions which the Court could place on the defendant's release which would reasonably assure the defendant's appearance in Court and the safety of the community. *See* 18 U.S.C. § 3142(g) (citing factors to consider including nature and circumstances of offense, weight of evidence, defendant's history and characteristics, and danger to any person or community). Because of this, the United States requests that a Detention Hearing be held and that the

defendant be detained. *See generally United States v. Sazenski*, 806 F.2d 846, 848 (8th Cir. 1986); *United States v. Warren*, 787 F.2d 1337, 1338 (8th Cir. 1986).

4. The United States further requests, pursuant to 18 U.S.C. § 3142(f)(2), that the court enter an order continuing for a period of three days following the defendant's first appearance (not including any intermediate Saturday, Sunday, or legal holiday), the hearing on this detention motion, which continuance will permit the United States to fully prepare an evidentiary presentation in support of pretrial detention.

WHEREFORE, based on the foregoing, the United States requests that the Court hold a Detention Hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Tammy Dickinson  
United States Attorney

By:

/s/ *Abram McGull II*  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on February 19, 2016, to the CM-ECF system of the United States District Court for the Western District of Missouri, and a copy of the foregoing will be hand-delivered to the defendant at her first appearance before a judicial officer.

/s/ Abram McGull II  
Abram McGull II  
Assistant United States Attorney